FILED

JAN 1 2 2023

# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO CLEVELAND

UNITED STATES OF AMERICA,	) <u>INDICTMENT</u> )
Plaintiff,	)
· <b>v</b> .	3 CASENO 23 CR 0031
ROBERT R. PARHIZGAR,	Title 18, United States Code, Sections 1343
Defendant.	JUDGE CALABRESE

#### GENERAL ALLEGATIONS

At all times material to this Indictment:

- Defendant ROBERT R. PARHIZGAR was a United States citizen and resident of Lubbock, Texas.
- 2. J.T., an individual known to the Grand Jury but not named herein, was a resident of the Northern District of Ohio.

The Grand Jury charges:

3. Paragraphs 1 and 2 of this Indictment are re-alleged and incorporated by reference as it fully set forth herein.

#### THE SCHEME

4. On or about January 24, 2019, Defendant ROBERT R. PARHIZGAR devised and intended to devise a scheme to defraud J.T., and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

### **EXECUTION OF THE SCHEME**

- 5. On or about January 4, 2019, PAHIZGAR and J.T. executed a contract wherein J.T. loaned PARHIZGAR \$306.148.94.
- 6. PARHIZGAR agreed to repay J.T. through the sale of seven horses or the sale of a 1967 Beechcraft BARON 95-C55, serial number TE-407.
- 7. PARHIZGAR fraudulently represented that he was the owner of the 1967 Beechcraft BARON 95-C55, serial number TE-407.
- 8. PARHIZHAR did not own the 1967 Beechcraft BARON 95-C55, serial number TE-407, and the loan was not repaid.
- 9. On or about the date listed below, in the Northern District of Ohio and elsewhere, Defendant ROBERT R. PARHIZGAR, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

Date	Sender / Originating	Recipient / Location	Description
January 24, 2019	J.T./ PNC Bank,	ROBERT	\$275,000
	Struthers, Ohio	PARHIZGAR /	
		JPMorgan Chase Bank, Bank One	
		Texas, Texas	

All in violation of Title 18, United States Code, Section 1343.

## A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.